

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

July 03, 2025

Nathan Ochsner, Clerk of Court

United States of America)

v.)

Alondra Ivette DELGADILLO)
YOB: 1997 Citizenship: USC)
)
)
)

Case No. 7:25-mj-01538-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 3, 2025 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 United States Code § 545

Did knowingly import into the US Merchandise contrary to law to wit two (2) spider monkeys utilising a method of concealment.

16 United States Code § 1538

Unlawfully imported and transported ESA protected and CITES regulated wildlife to wit two (2) spider monkeys.

16 United States Code § 3372

Unlawfully imported transported two (2) spider monkeys in violation of 18 USC 545 and international law (CITES).

This criminal complaint is based on these facts:

SEE ATTACHMENT A

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Cahal McColgan.

Submitted by reliable electronic means, sworn to and
attested telephonically per Fed. R. Cr.P.4.1, and
probable cause found on:

Date: 07/03/2025 at 3:14 p.m.

City and state: McAllen, Texas

/s/ Leonardo DeFoe

Complainant's signature

Leonardo DeFoe HSI Special Agent

Printed name and title



Judge's signature

J. Scott Hacker U.S. Magistrate Judge

Printed name and title

Attachment A

1. On July 3, 2025, Alondra Ivette DELGADILLO was traveling from the Republic of Mexico to the United States via the vehicle lane at the Hidalgo-International Port of Entry in Hidalgo, Texas. During the inspection, DELGADILLO provided a negative customs declaration to a US Customs and Border Protection Officer (CBPO). DELGADILLO was referred to vehicle secondary inspection.
2. While at the secondary inspection site, DELGADILLO attempted to exit the vehicle with a black gym bag. CBP Officers instructed DELAGDILLO to leave the bag with the vehicle. During the secondary search, CBP Officers searched the black gym bag and discovered two (2) infant spider monkeys inside.
3. U.S. Fish and Wildlife Service (USFWS) and Homeland Security Investigations (HSI) Special Agents (SAs) conducted an interview with DELGADILLO. During the post Miranda interview DELGADILLO admitted to knowingly smuggling the monkeys into the United States. DELGADILLO stated that she was afraid that she would get in trouble, and the monkeys would be taken away if the monkeys were discovered. This is why she did not declare the monkeys upon entry into the United States and why she attempted to take the black gym bag with her. DELGADILLO stated that she received the monkeys from her ex-boyfriend in Mexico as a birthday present.
4. Spider Monkeys are protected under the Endangered Species Act (ESA) 16 USC 1538. Additionally, their importation is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) 50 CFR 23. To legally import a spider monkey, one must possess a CITES permit and license to do so from the US Fish and Wildlife Service. DELGADILLO does not possess a CITES permit.
5. Additionally, anyone selling or transporting spider monkeys, for commercial purposes must be licensed by the US Department of Agriculture (USDA) to legally do so. DELGADILLO does not possess a USDA license to transport or sell spider monkeys.
6. DELGADILLO failed to follow the provisions of 50 CRF 14 and 23 and subsequently violated 18 USC 545 smuggling goods into the United States. Additionally, the transport and importation of wildlife into the United States is violation of 16 USC 3372 (Lacey Act) and 18 USC 2.